

# EXHIBIT C



UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

-----x  
IN RE: COLUMBIA UNIVERSITY MDL NO. 1592  
PATENT LITIGATION

-----x  
IMMUNEX CORPORATION, a Washington  
Corporation and AMGEN INC., a Delaware  
Corporation,

Plaintiffs,

Civil Action No.

-against-

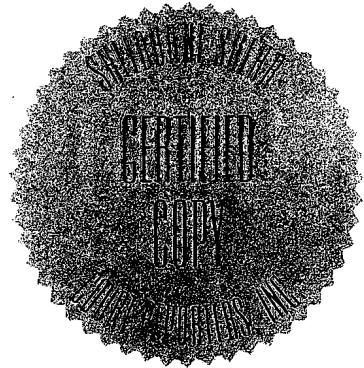
04-10740-MLW

THE TRUSTEES OF COLUMBIA UNIVERSITY  
in the City of New York, a New York  
Corporation,

Defendants.

-----x  
AND RELATED COUNTERCLAIM

-----x  
September 14, 2004  
9:11 a.m.



VIDEOTAPED DEPOSITION of P.R. SRINIVASAN,  
taken by the Plaintiffs, pursuant to Subpoena, at  
the law offices of WILSON SONSINI GOODRICH &  
ROSATI, P.C., 12 East 49th Street, New York, New  
York before Karen Perlman, a Shorthand Reporter  
and Notary Public within and for the State of New  
York.

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1 P.R. Srinivasan

2 that, and that provides funds for certain  
3 activities, that's how you -- you just came to  
4 know of it.

5 Q. When you referred to the funds for  
6 certain activities, what were you referring to?

7 A. It was, I think it -- because they  
8 had -- it supported some -- it supported the --  
9 their labs -- laboratories, and also I think they  
10 had -- and they also provided some -- it provided  
11 also some friends, I think -- I don't know how --  
12 I have no idea how they did that.

13 It also said that some -- it also  
14 helped some of the students who needed stipends  
15 or something like that, that's -- that's the only  
16 way I heard it.

17 Q. Did any of the money from these  
18 patents benefit your department?

19 MR. BARKSY: No foundation. Calls  
20 for speculation.

21 You may answer.

22 A. I -- I have no idea, I have no idea.  
23 At least I didn't get any money. That's all I  
24 can tell you.

25 Q. Did any of your students receive any

1 P.R. Srinivasan

2 money --

3 A. No.

4 Q. -- from those funds?

5 Do you recall who first contacted  
6 you regarding becoming a consultant in connection  
7 with this litigation?

8 MR. BARKSY: Well, your question  
9 assumes facts not in evidence.

10 But, Professor Srinivasan, she's only  
11 asking if you remember the name of the  
12 person with whom you first spoke, that's  
13 all she's asking and that is all you should  
14 answer.

15 A. Yes, I -- I do remember it -- the --  
16 it was Mr. Chen from the -- with general counsel,  
17 I guess, general counsel and he --

18 MR. BARKSY: You've answered her  
19 question. Thank you.

20 Q. When you say, "general counsel,"  
21 you're referring to the general counsel of  
22 Columbia University?

23 A. I don't know what is -- I don't know  
24 what his exact title is. I -- I assumed he was a  
25 general counsel. I don't know what capacity

1 P.R. Srinivasan

2 general counsel, I don't have any idea.

3 Q. But he's an attorney at Columbia  
4 University?

5 A. I believe so, yes, he said he was an  
6 attorney here.

7 Q. And when did Mr. Chen first contact  
8 you regarding becoming a consultant in this  
9 litigation?

10 MR. BARSKY: You're only being asked  
11 about a date, so you should not repeat any  
12 other manner of your communications.

13 A. May -- may -- maybe during the  
14 summer, I don't know. Certainly about -- just --  
15 I don't know exactly when, I can't tell you, but  
16 certainly it would be between the last -- at  
17 least during the last -- during the last two  
18 months. That is all I can recall, I can't recall  
19 when.

20 Q. So sometime after the 4th of July  
21 holiday this year?

22 A. As I said, since I don't -- I don't  
23 recall exact date because I never -- I never paid  
24 attention -- at least paid attention to the -- as  
25 to when, but it's a fact, it's possible, but I

1 P.R. Srinivasan

2 don't remember right now.

3 Q. Have you -- let's see. Let me start  
4 again.

5 Did you meet with Mr. Chen in  
6 person?

7 A. No, I did not.

8 Q. Have you ever met someone named John  
9 White?

10 A. John White?

11 Q. Umm-hmm.

12 A. No.

13 Q. Have you been asked to sign any  
14 documents in connection with prosecution of a  
15 patent on which Richard Axel is the named  
16 inventor?

17 MR. BARKSY: Can I hear that  
18 question again, please.

19 (The record is read.)

20 MR. BARKSY: You may answer.

21 A. It's still not clear to me when you  
22 mean prosecution of a patent.

23 Q. By prosecution of a patent, I'm  
24 referring to interactions with the Patent and  
25 Trademark Office of the United States?

CERTIFICATE

STATE OF NEW YORK )

COUNTY OF NEW YORK)

I, KAREN PERLMAN, a Shorthand Reporter and Notary Public within and for the State of New York, do hereby certify:

That P.R. SRINIVASAN, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 15th day of September, 2004.



KAREN PERLMAN